

August 19, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Room TW-A325 Washington, DC 20554

Re: REQUEST FOR EXTENSION OF TIME, MB Docket No. 14-57, Applications of Comcast Corp. and Time Warner Cable Inc. For Consent To Assign or Transfer Control of Licenses and Authorizations.

Dear Secretary Dortch:

Pursuant to 47 C.F.R. § 1.46, the Office of the Mayor of the City of Los Angeles, California ("Office of the Mayor") requests an extension of time to file in the above-captioned proceeding. Notice that the request is being filed is contemporaneously being provided orally to other parties and Commission staff personnel responsible for acting on the motion in accordance with 47 C.F.R. § 1.46(c). Comments and petitions to deny the applications currently must be filed no later than August 25, 2014. The Office of the Mayor respectfully requests a two-week extension to September 8, 2014. Due to the Labor Day holiday, this is effectively a request for an additional 8 working days. Granting this extension will serve the public interest and allow a more complete record to be developed in this proceeding.

The Office of the Mayor recognizes that Section 1.46 states that it is "the policy of the Commission that extensions of time shall not be routinely granted." However, extensions are warranted when, among other things, the additional time will serve the public interest. Here, a brief extension to September 8, 2014, will serve the public interest.

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¹ See, e,g., In the Matter of 1998 Biennial Regulatory Review — Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules, 13 FCC Rcd. 13513 (July 23, 1998).

1. An extension is needed given the complexity of the transactions and breadth of issues involved. An extension is appropriate because of the complexity and breadth of the transactions and issues involved and the relatively recent release of information critical to the evaluation of the transactions.

On July 10, 2014, the Commission released a public notice seeking comment from interested persons to assist the Commission in its independent review of several large and complex transactions, including the merger of Comcast Corporation ("Comcast") and Time Warner Cable Inc. ("TWC"); the post-merger sale to Charter Communications, Inc. ("Charter") of certain former TWC cable systems; the exchange between Comcast and Charter of cable systems, as well as cable networks affiliated with those systems; and the spinoff of cable systems serving certain legacy Comcast video customers into SpinCo (now denominated "Midwest Cable"), which will operate as a new, publicly traded cable company (the latter three transactions being the "Divestiture Transactions").²

While Comcast and TWC submitted joint applications to the Commission on April 8, 2014, the Divestiture Transactions are critical elements of the proposed merger and the public interest statement, supplemental economic analysis and other information about those transactions (as well as a request to consider the transactions jointly) was only filed on June 4 and 5, 2014.

Participation is something that no community undertakes lightly, and it has taken time to review the issues critical to the City of Los Angeles. The merger is daunting in scope and in potential effect, particularly in areas like the City of Los Angeles that are currently served by both TWC and Charter. As noted, critical information on the Divestiture Transactions was only made available relatively recently. The Commission emphasized in its Public Notice, at page 10, that petitioners and commenters should raise "all issues" in their initial filings to allow the Commission to consider fully all substantive issues regarding the applications in as timely and efficient a manner as possible, and that no new issues may be raised in responses or replies. It is therefore important that Los Angeles, and others, have additional time – until at least September 8 – to prepare filings. The requested short extension will provide the Commission and the public with the benefit of a more complete and well-developed record of issues.

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² Commission Seeks Comment on Applications of Comcast Corporation, Time Warner Cable Inc., Charter Communications, Inc., and Spinco to Assign and Transfer Control of FCC Licenses, Public Notice, MB Docket No. 14-57, DA 14-986 (rel. July 10, 2014) ("Public Notice").

- 2. An extension is appropriate because the summer timing of the public notice will make filing by August 25 difficult. Meeting the filing deadline in this complex transaction has been made more difficult by the summer timing of the notice. For many communities, including Los Angeles, the summer timing of the notice issued after July 4th and requiring a response before Labor Day has made it challenging to prepare complete comments because of limited availability of staff and officials due to annual summer leave schedules. A limited extension of two weeks to just after Labor Day will add only eight working days to the filing period yet allow more complete and thoughtful filings to be developed that will assist the Commission.
- 3. No harm will result to any party in the proceeding due to granting the requested extension. A short extension will not harm any party to the proceeding. The Commission's review of these transactions is anticipated to take several months, and the process is only at the beginning stages. Unlike other proceedings where even small delays can be critical because of their potential domino effects, *In re Maricopa County*, 2014 FCC LEXIS 2652 (F.C.C. July 24, 2014), no harm will result to any party in the proceeding if this extension request is granted.

For the above reasons, the Office of the Mayor of the City of Los Angeles requests that the Commission extend the deadline for comments and petitions to deny in this matter from August 25 to September 8.

Respectfully submitted,

ERIC GARCETTI

Mayor

cc: Chairman Wheeler

Commissioner Clyburn

Commissioner Rosenworcel

Commissioner Pai

Commissioner O'Rielly

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CERTIFICATE OF SERVICE

I, Gail A. Karish, hereby certify that on August 19, 2014, I caused true and correct copies of the foregoing REQUEST FOR EXTENSION OF TIME to be served electronically to the following:

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Today, I also orally notified Mr. Hurwitz, Mr. Brill, Mr. Feder, Mr. Bird, and Ms. Glauberman of the REQUEST FOR EXTENSION by speaking to each of them by telephone or by leaving a detailed voice message.

_/Gail A. Karish/ Gail A. Karish

Best Best & Krieger, LLP